IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In Re: **SALVADOR VARGAS BARBA** **ISABEL I BLANCO GARROTE** Debtor(s)	Case No.: 10-02646 BKT Chapter 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.

2. That the reason for amendment is to consent lift of stay in favor of "Pelican Reef" and to state that if any tax refund are received by debtor, will be tendered to the trustee as periodic payments to fund the plan until plan completion in addition to payments already provided herein. if debtor(s) need to use any part of these funds, proper authorization will be sought from the court for such purpose.

WHEREFORE, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mal to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 21st day of May of 2010.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

United States Bankruptcy Court
District of Puerto Rico

IN RE:

VARGAS BARBA, SALVADOR & BLANCO GARROTE, ISABEL I
Debtor(s)

Case No. 10-02646 BKT
Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: ______ ☑ AMENDED PLAN DATED: 5/21/2010
☐ PRE ☐ POST-CONFIRMATION Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 500.00 x 14 = $ 7,000.00
$ 700.00 x 46 = $ 32,200.00
$ ______ x ______ = $ ______
$ ______ x ______ = $ ______
$ ______ x ______ = $ ______

TOTAL: $ 39,200.00

Additional Payments:
$ ______ to be paid as a LUMP SUM within ______ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$ ______ x ______ = $ ______

PROPOSED BASE: $ 39,200.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ 2,574.00

Signed: */s/ SALVADOR VARGAS BARBA*
Debtor

/s/ ISABEL I BLANCO GARROTE
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ____ $ ______
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:
1. ☑ Trustee pays secured ARREARS:

Cr.	Cr.	Cr.
Cr. DORAL MORTGAGE	Cr.	Cr.
# 80010728	#	#
$ 1.00	$	$

2. ☑ Trustee pays IN FULL Secured Claims:

Cr.	Cr.	Cr.
Cr. CRIM	Cr.	Cr.
# 12500000664051	#	#
$ 3,259.57	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☑ Debtor SURRENDERS COLLATERAL to Lien Holder:
BPPR
5. ☐ Other:

6. ☑ Debtor otherwise maintains regular payments directly to:
DORAL MORTGAGE

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)
D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ______
☐ Paid 100% / ☐ Other: ______

Cr.	Cr.	Cr.
Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
See Continuation Sheet

Attorney for Debtor Jose Prieto Phone: (787) 607-2166

IN RE VARGAS BARBA, SALVADOR & BLANCO GARROTE, ISABEL I — Case No. 10-02646 BKT

Debtor(s)

CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 1 of 2

	Cr	#	$
Executory Contracts - Assumed:	FIRST BANK		
	FIRST BANK		

CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 2 of 2

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

DEBTORS WILL ASSUME LEASES WITH FIRST BANK (2)

PLAN INCREASES WHEN DEBTORS PAY OFF BOTH LEASES AND SAVINGS RESERVE ARE CONSUMED ON MAY 2011.

DEBTOR CONSENTS LIFT OF STAY INF AVOR OF CRIM (CATASTRO #1990826550210000), BANCO POPULAR (MORTGAGE) AND PELICAN REEF.

VARGAS BARBA, SALVADOR
P O BOX 367086
SAN JUAN, PR 00936-7086

DORAL MORTGAGE
P O BOX 70308
SAN JUAN, PR 00936

BLANCO GARROTE, ISABEL I
P O BOX 367086
SAN JUAN, PR 00936-7086

FIRST BANK
PO BOX 9146
SAN JUAN, PR 00908

Jose Prieto
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San Juan, PR 00936-3565

FIRST BANK
FIA CARD SERVICES
WILMINGTON, DE 19886-5019

AT&T
P O BOX 6463
CAROL STREAM, IL 60197-6463

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Knoxville, TN 37721

BANCO DE DESARROLLO ECONOMICO
P O BOX 2134
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PELICAN REEF
950 CALLE BASTIA APT708
COND PELICAN REEF
RINCON, PR 00667

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P O BOX 366818
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BPPR
P O BOX 3228
SAN JUAN, PR 00936

CRIM
P.O. Box 195387
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DEPT DE TRANSPORTACION
Y OBRAS PUBLICAS
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